

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

Gregory Boyer,

Plaintiff,

v.

Advanced Correctional Healthcare, Inc.,
et al.,

Defendants.

Case No: 3:20-cv-1123-JDP

Judge James D. Peterson

Magistrate Judge Stephen L. Crocker

Gregory Boyer,

Plaintiff,

v.

USA Medical & Psychological Staffing, Inc.,
et al.,

Defendants.

Case No: 3:22-cv-00723-JDP

Judge James D. Peterson

Magistrate Judge Stephen L. Crocker

JOINT MOTION TO AMEND THE SCHEDULING ORDER

The parties, through their respective counsel, jointly move this Court to amend the current Scheduling Order. In support of this request, the parties state the following:

1. The Parties have been working and continue to work diligently towards discovery.
2. On October 25, 2024, Plaintiff received records from Defendant ACH, in response to a subpoena Plaintiff issued to Gallagher Bassett Services, Inc.
3. Upon review of the documents, Plaintiff learned that Defendant ACH has not produced documents responsive to the subpoena.
4. The Parties met and conferred on the issue several times.
5. During a meet and confer by phone on November 7, 2024, Defendant ACH agreed to investigate the issue and seek an extension, and agreed to produce documents responsive to the

subpoena from 2022–2024 or a privilege log responsive to the subpoena in the next few days or revisit the schedule again if they do not.

6. Separately, on November 5, 2024, Defendant ACH produced six additional documents that ACH counsel represents ACH inadvertently withheld during fact discovery.

7. The Court’s current scheduling order is as follows:

- a) Plaintiff’s supplemental Monell expert report due November 11th
- b) Plaintiff’s deposition of Monell expert due December 6th
- c) Defendant’s expert disclosure due January 10th

Due to ACH’s incomplete and late production, and showing good cause, the Parties respectfully request that the Court amend the Scheduling Order as follows:

- a) Plaintiff’s supplemental Monell expert report now due November 26, 2024
- b) Plaintiff’s deposition of Monell expert now due December 20, 2024
- c) Defendant’s expert disclosure now due January 24, 2024

WHEREFORE, the undersigned counsel respectfully requests that this Court grant this joint motion to amend.

Dated: November 12, 2024.

By: Maria Makar

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